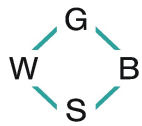


**EXHIBIT A**

**Statement of Fees**



**GROOMBRIDGE WU  
BAUGHMAN & STONE**  
A LIMITED LIABILITY PARTNERSHIP

565 Fifth Avenue  
Suite 2900  
New York, NY 10017

(332) 269-0030  
[www.groombridgewu.com](http://www.groombridgewu.com)

DeCurtis Corp.  
3208 East Colonial Drive  
Suite C190  
Orlando, FL 32803  
USA

September 18, 2023  
**Reference No. 216**

Professional Services from August 1 to August 29, 2023

CLIENT: 0018 - DeCurtis Corp.

<b>Matter</b>	<b>Services</b>	<b>Expenses</b>	<b>Total</b>
0002 - DeCurtis Restructuring	80,243.00	0.00	80,243.00
<b>Total for Services and Expenses</b>			<b><u>\$80,243.00</u></b>

PAYMENT IN U.S. DOLLARS MAY BE MADE BY WIRE TRANSFER TO OUR  
ACCOUNT NO. 9883467806 AT M&T BANK, 115 SOUTH RIDGE ST.,  
RYE BROOK, NY 10573, ROUTING NUMBER: 022000046

CHARGES WHICH HAVE NOT BEEN RECORDED AS OF THE ABOVE DATE  
WILL BE INVOICED LATER.

Client Ref: 0018 - 0002  
**Reference No. 216**

September 18, 2023  
**Page 1**

Re: 0002 DeCurtis Restructuring

Date				Hours	Amount
08/01/23					
BH	L120	A101	Review post trial briefings for redactions.	0.60	480.00
JHW	L460	A107	Correspond with L. Akkerman (Potter Anderson) and K. Bersani regarding redactions.	0.10	202.50
ACP	L120	A101	Discuss redactions with K. Bersani and review the same.	0.10	121.00
08/02/23					
BH	L120	A101	Check exhibit list.	0.40	320.00
CWW	L460	A104	Analyze DeCurtis papers for redactions.	0.10	80.00
CWW	L460	A104	Analyze Carnival exhibit list for objections.	0.20	160.00
08/03/23					
BH	L120	A101	Review Carnival's post trial briefs.	1.10	880.00
08/04/23					
JHW	L450	A109	Appear for Debtors at court status conference.	0.20	405.00
JHW	L460	A106	Conference with J. Learish (DeCurtis), J. Carino (DeCurtis), A. Penfield, C.W. Wu, K. Bersani, and B. Hsu regarding redactions.	0.30	607.50
JHW	L460	A104	Analyze confidentiality and redactions to trial exhibits, with C.W. Wu and K. Bersani.	1.80	3,645.00
NPG	L120	A101	Email and calls re status conference with court and items in record to be sealed [0.3].	0.30	607.50
BH	L120	A101	Prepare for status conference.	0.20	160.00
BH	L120	A101	Confer with clients regarding	0.20	160.00

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**Reference No. 216**

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<b>Date</b>				<b>Hours</b>	<b>Amount</b>
08/04/23					
status conference.					
BH	L120	A101	Attend status conference.	0.20	160.00
BH	L120	A101	Confer with team regarding status conference.	0.70	560.00
BH	L120	A101	Revise exhibit list.	3.40	2,720.00
ACP	L230	A109	Attend court conference regarding sealing motions.	0.20	242.00
KNB	L110	A106	Meet with client to discuss confidentiality of materials in post-trial filings.	0.40	294.00
KNB	L230	A109	Attend Court's status conference to discuss post-trial filing confidentiality.	0.30	220.50
KNB	L250	A104	Analyze joint exhibit list for confidentiality designations.	5.50	4,042.50
CWW	L450	A109	Take notes for DeCurtis status conference.	0.20	160.00
CWW	L450	A101	Discuss preparation for status conference with J. Wu, A. Penfield, K. Bersani, B. Hsu, E. Lazerowitz (Cooley), J. Learish (DeCurtis), and J. Carino (DeCurtis).	0.20	160.00
CWW	L460	A105	Discuss redactions to Carnival papers with K. Bersani and B. Hsu.	0.20	160.00
CWW	L460	A104	Analyze exhibit lists for exhibits to remain sealed or confidential.	1.80	1,440.00
08/05/23					
JHW	L460	A105	Conference with K. Bersani regarding confidentiality designations proposed by Carnival.	0.50	1,012.50

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**Reference No. 216**

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**Page 3**

<b>Date</b>				<b>Hours</b>	<b>Amount</b>
08/05/23					
JHW	L460	A103	Revise exhibit list for filing with Court regarding confidentiality designations, with K. Bersani.	0.20	405.00
KNB	L250	A104	Analyze joint exhibit list for confidentiality designations.	2.70	1,984.50
KNB	L250	A107	Meet and confer with counsel regarding joint exhibit list confidentiality designations.	0.20	147.00
08/06/23					
JHW	L460	A103	Revise correspondence to Carnival regarding filing exhibit list with confidentiality designations, with K. Bersani.	0.10	202.50
KNB	L250	A104	Analyze joint exhibit list confidentiality designations.	1.50	1,102.50
08/07/23					
CWW	L460	A104	Analyze A. Saxena (DeCurtis) papers for redactions.	0.20	160.00
08/09/23					
BH	L120	A101	Review and analyze outcome of litigation.	1.40	1,120.00
BH	L120	A101	Confer with clients regarding outcome of litigation.	1.00	800.00
BH	L120	A101	Confer with team regarding outcome of litigation.	0.30	240.00
ACP	L120	A101	Attend discussion with client regarding decision (1.0).	1.00	1,210.00
NPG	L120	A104	Review decision on ownership and analyze potential next steps [1.3].	1.30	2,632.50
NPG	L120	A104	Call with client (D. Fournier, J. Learish at DeCurtis) re decision on ownership and next steps [0.7].	0.70	1,417.50
NPG	L120	A105		0.30	607.50

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**Reference No. 216**

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Date	Hours	Amount
08/09/23		
		Follow up with team re re decision on ownership and next steps [0.3].
JHW L460 A106	1.00	2,025.00
		Conference with N. Groombridge, E. Lazerowitz (Cooley), C. Speckhart (Cooley), J. Carino (DeCurtis), J. Learish (DeCurtis), and D. Fournier (DeCurtis) regarding court ruling.
JHW L460 A104	0.80	1,620.00
		Analyze court ruling with N. Groombridge.
KNB L120 A106	0.90	661.50
		Post-judgment litigation team meeting with client.
CWW L460 A104	0.50	400.00
		Review opinion regarding ownership and injunctive relief.
BBP L460 A104	0.30	142.50
		Review and analyze opinion.
ACP L120 A104	1.00	1,210.00
		Review decision and correspondence regarding the same (1.0).
ACP L120 A109	0.20	242.00
		Attend debrief with case team regarding decision (0.2).
BBP L120 A103	0.30	142.50
		Prepare summary of opinion for attorney review.
08/10/23		
NPG L120 A104	0.80	1,620.00
		Further analysis of decision on ownership and potential next steps [0.8].
NPG L120 A106	0.70	1,417.50
		Call with client and representatives of Disney and Virgin re same [0.7].
08/11/23		
NPG L120 A104	0.30	607.50
		Follow up re impact of injunction [0.3].
08/12/23		
NPG L120 A108	0.40	810.00

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**Reference No. 216**

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Date				Hours	Amount	
08/12/23			Follow up re outreach to Disney and Carnival on impact of injunction [0.4].			
08/13/23	NPG	L120	A107	Follow up re impact of injunction including email with counsel for Disney and Virgin Voyages [0.6].	0.60	1,215.00
	JHW	L460	A103	Draft response to Carnival, with N. Groombridge and D. Fournier (DeCurtis).	0.20	405.00
08/14/23	ACP	L120	A105	Discuss responses to questions from DeCurtis with J. Wu and N. Groombridge.	0.70	847.00
	ACP	L120	A106	Attend strategy meeting with GWBS, DeCurtis, Potter, Cooley, Invictus, and Proskauer teams to determine next steps and meet and confer strategy.	1.00	1,210.00
	JHW	L460	A107	Conference with N. Groombridge, D. Hillman (Proskauer), C. Delano (Invictus), A. Patel (Invictus), V. Indelicato (Proskauer), E. Lazerowitz (Cooley), C. Speckhart (Cooley), J. Carino (DeCurtis), J. Learish (DeCurtis), and D. Fournier (DeCurtis) regarding legal strategy.	1.00	2,025.00
	BH	L120	A101	Confer with team regarding potential appeal strategy.	1.70	1,360.00
	KNB	L120	A106	Post-judgment litigation team meeting with client.	1.10	808.50
	NPG	L120	A101	Follow up re court direction to meet-and-confer on injunction scope [0.5].	0.50	1,012.50

08/15/23

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Date	Hours	Amount
08/15/23		
ACP L120 A107 Attend meet and confer with Carnival.	0.60	726.00
ACP L120 A101 Attend team meeting regarding path forward for DeCurtis.	0.60	726.00
JHW L450 A109 Conference with S. Routh, N. Groombridge, D. Hillman (Proskauer), E. Lazerowitz (Cooley), K. Good (Potter Anderson), C. Delano (Invictus), A. Patel (Invictus), H. Murtagh, A. Troop, and V. Indelicato (Proskauer) regarding scope of injunction pursuant to Court order.	0.70	1,417.50
JHW L460 A107 Conference with N. Groombridge, D. Hillman (Proskauer), C. Delano (Invictus), A. Patel (Invictus), M. Bienenstock, V. Indelicato (Proskauer), E. Lazerowitz (Cooley), C. Speckhart (Cooley), and D. Fournier (DeCurtis) regarding legal strategy.	0.50	1,012.50
JHW L460 A108 Correspond with D. Hillman (Proskauer), S. Routh, N. Groombridge, E. Lazerowitz (Cooley), K. Good (Potter Anderson), C. Delano (Invictus), A. Patel (Invictus), H. Murtagh, A. Troop, and V. Indelicato (Proskauer) regarding proposal regarding scope of injunction and resolution.	0.20	405.00
JHW L120 A107 Send A. Greenfield (Virgin counsel) portions of evidentiary record per his request.	0.40	810.00
BH L120 A101 Strategize post trial issues.	0.20	160.00
BH L120 A101 Attend call with Carnival regarding post trial issues.	0.70	560.00
BH L120 A101	0.60	480.00



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Date	Hours	Amount
08/15/23		
		Attend call with Invictus regarding post trial issues.
08/16/23		
JHW L460 A107	0.20	405.00
		Conference with D. Hillman (Proskauer), C. Delano (Invictus), A. Patel (Invictus), M. Bienenstock, V. Indelicato (Proskauer), E. Lazerowitz (Cooley), C. Speckhart (Cooley), and D. Fournier (DeCurtis) regarding legal strategy.
ACP L120 A108	0.20	242.00
		Attend meet and confer with Carnival regarding going forward strategy.
BH L120 A101	0.30	240.00
		Attend call with Carnival regarding post trial issues.
08/19/23		
NPG L120 A101	0.20	405.00
		Email re settlement negotiations and foreclosure plan [0.2].
08/21/23		
NPG L120 A101	0.60	1,215.00
		Prepare for and participate in settlement call with Carnival [0.6].
08/22/23		
NPG L120 A101	0.30	607.50
		Email and calls re preparation of notice of appeal [0.3].
NPG L120 A104	0.20	405.00
		Review draft notice of appeal [0.2].
08/24/23		
NPG L230 A109	1.00	2,025.00
		Attend status conference re emergent issues [1.0].
NPG L120 A106	1.80	3,645.00
		Work on preparation of draft form of injunction including calls with client [1.8].
NPG L430 A104	0.30	607.50
		Review recent filings [0.3].

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<b>Date</b>				<b>Hours</b>	<b>Amount</b>
08/24/23					
ACP	L250	A103	Work on draft for proposal for permanent injunction, including with N. Groombridge, DeCurtis, Invictus, and B. Hsu.	2.70	3,267.00
BH	L120	A101	Draft proposed order for permanent injunction.	3.20	2,560.00
BH	L120	A101	Confer with team regarding permanent injunction strategy.	0.80	640.00
08/28/23					
NPG	L120	A106	Call with client and Invictus re injunction scope [0.7].	0.70	1,417.50
ACP	L120	A101	Attend call regarding injunction with DeCurtis, Invictus, N. Groombridge, and B. Hsu.	0.90	1,089.00
BH	L120	A101	Attend meeting regarding injunction	0.90	720.00
08/29/23					
NPG	L450	A109	Attend remote hearing re conversion motion and other emergent issues [0.8].	0.80	1,620.00
JHW	L440	A109	Attend court hearing.	1.00	2,025.00

#### **Summary of Services**

		<b>Rate</b>	<b>Hours</b>	<b>Amount</b>
KNB	Kyle N. Bersani	735.00	12.60	9,261.00
NPG	Nicholas P. Groombridge	2,025.00	11.80	23,895.00
BH	Ben Hsu	800.00	17.90	14,320.00
ACP	Allison C. Penfield	1,210.00	9.20	11,132.00
BBP	Bernie Pound	475.00	0.60	285.00
CWW	Chih-wei Wu	800.00	3.40	2,720.00
JHW	Jennifer H. Wu	2,025.00	9.20	18,630.00
<b>Total for Services</b>			<b>64.70</b>	<b>\$80,243.00</b>

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**Total for Services and Expenses**

**\$80,243.00**